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ABSTRACT

Changes in public policies that have implications for experiential education are discussed. It is suggested that the federal government's reduction of federal student assistance does not represent a policy adverse to experiential education; yet, its effects are likely to have substantially negative outcomes for programs built on 15 years of consistent federal support. The relatively stable funding bases, notably College Work-Study and Cooperative Education, are likely to be substantially eroded, and support for innovation may be in serious jeopardy. Requirements of "satisfactory progress" and "enrollment status" of federal student aid programs are being reevaluated in ways that may adversely affect experiential education. The Veterans Administration is one agency that views legitimate education as classroom instruction. At the state level, policy may limit the amount of equivalent credit that may be awarded for prior learning, limit the degrees to which such credit may be attached, or otherwise constrain the freedom of the institution to configure its academic program. Finally, the policies of accrediting agencies can have the effect of defining whether experiential programs may be included in the curriculum of a college, or whether the college can be accredited. (SW)

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Occasional Papers

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POLICY ISSUES IN EXPERIENTIAL EDUCATION

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In the autumn of 1977, I was commissioned* to develop an analysis of federal policies affecting the prospects for experiential education. After a review of the various federally-assisted programs that contained experiential learning components, such as College Work-Study, Cooperative Education and the then-new Lifelong Learning Act, as well as ancillary policies that tended to support or constrain experiential education efforts, such as the laws and regulations pertaining to veterans' education benefits,

* "Federal Policies towards Experiential Education" by Michael B. Goldstein, paper commissioned by NSIEE and CAEL and published through Institute for Educational Leadership, George Washington University, December 1977.

I concluded that there was little evidence of any intended federal policy either for or against experiential education. To be sure, there were programs and regulations that both aided and constrained these efforts, but by and large their effects were peripheral to some other purpose. I closed with the observation that American higher education was becoming "an environment where the student will increasingly have the options -- and the resources -- to choose his or her forum for postsecondary education," and I suggested that "the advocates of experiential learning be in the forefront of marketing their type of program so as to best attract a significant 'market share'."

The assumption underlying this conclusion was that a continuation of the open-market strategy made possible by increasing federal student assistance would make postsecondary education more competitive and potentially more attractive for new forms of delivery, including of course the various formulations of experiential learning. The 1980 reauthorization of the Higher Education Act strengthened this view, representing as it did a virtual cornucopea of resources, particularly in the form of student assistance. When the idea of preparing this monograph was first discussed, the 1980 amendments were still fresh in everyone's mind, and the current national Administration, despite ominous campaign rhetoric about containing spending and cutting taxes, had only recently assumed office. Since the major initiatives established under the landmark Higher Education Act of 1965 had not only survived but indeed had been expanded under a series of both Democratic and Republican administrations, it would not have been unreasonable to assume that these policies, consisting as they did of steadily increasing federal support for postsecondary education in general

and student choice in particular, would continue with little significant abatement.

Nothing could have been more wrong.

The present Administration has taken as an article of faith the substantial and indeed precipitous withdrawal of the federal role in higher education, including what had come to be considered an almost sacrosanct responsibility for insuring every reasonably qualified student the financial resources to not only allow him or her to attend college but to attend either a public or a private institution. Reductions to be made in the current fiscal year appear as straws in the wind for massive changes yet to come, including proposals for the dismemberment of many institutional support programs, elimination of major portions of the campus-based student aid programs, and substantial reductions in funding levels for what remains. What student financial assistance remains would be reserved for the "truly needy", to use the currently popular phrase, while institutional support for innovation and alternative delivery systems would be reduced to levels of a decade or more ago (unadjusted, of course, for inflation).

All very interesting, in a perverse sort of way, but what does this have to do with experiential education? How do these changes in federal policy affect the future of the experiential learning field? The answer can only be supposition at this juncture, but if history offers any lessons, those elements of higher education that are outside of the so-called mainstream will be the first to suffer when the spectre of financial exigency is reared. The risk to the experiential education field becomes more clear when one recognizes that the explosive growth of this area of higher education in recent years can only in part be attributed to pedagogical and social developments that have made this form of learning more attractive to both

students and their institutions. In no small measure this development has been the result of evolutions in public policy, some affirmative and some deriving from policies altogether unrelated to experiential education.

The relationship of internships to public policy is not altogether a new one. During the Depression, the National Youth Corps was created to provide students with work to enable them to remain in school. While the program was primarily aimed at high school students, in many respects its aims --public service employment and earnings to support educations -- were remarkably similar to those of the College Work Study Program three decades later. The NYC of course vanished with the outbreak of WW II, and it was not until the Economic Opportunity Act of 1964 that the idea of federally-financed internships reappeared.

For those who remember the College Work Study Program only from its days after the enactment of the Higher Education Act, and up until the very recent past, calling this program an internship sounds far-fetched indeed. However, the original concept of CWS, as proposed in the precursor to the Economic Opportunity Act, proclaimed a <u>triad</u> of purposes: service to the community, enhancement of learning through real-world experience (the term "experiential learning" hadn't become popular yet), <u>and</u> financial assistance to enable the student to continue his or her higher education.

Were the language embodied in the debates surrounding the enactment of the Work Study program translated into operational guidelines and regulations, federal public policy would have created a substantial stimulus for funded service-learning opportunities. Indeed, had the managers responsible for this program within the then-Office of Education taken the intent of Congress to its logical conclusion, CWS could have provided the

framework for an internship effort that would have encompassed virtually every college and university in the nation, with a potential impact on hundreds of thousands of students and millions more citizens whose interests would have been advanced by the application of this great wealth of energy and talent to the needs of their communities.

Of course they did not, and College Work-Study was, for many years viewed by the official establishment as essentially a student financial aid program with overtones of institutional support, through the vehicle of providing a heavily subsidized work force for the campuses. Over time, however, the steadily increasing use of this mechanism for experiential learning purposes culminated in two significant amendments, embodied in the 1980 reauthorization of the Higher Education Act. One, the renewed Work-Study for Community Service Learning provision, sought to provide an incentive for the utilization of CWS resources to support certain valuable community service goals. The other was the inclusion of language, for the first time, requiring that institutions expend some effort to make work-study assignments relevant to the students' academic or vocational interests.

With this new combination of affirmative incentive and mandate (even if qualified) to develop the experiential component of CWS work, a new era for the internship community appeared at hand. A half billion dollars could annually be tapped to develop internship and similar experiential learning programs. Reticent financial aid and business officers could be flogged with new and relatively unambiguous statutory requirements. Students who could not afford to give of their time for service-learning activities now could receive a living stipend while they undertook their

activities. Coupled with continuing support for the Cooperative Education Program, and indeed with at least partial recognition that the two were in fact interrelated, a new day appeared to be dawning.

The only requirement for success was the continued substantial level of support for CWS. Since Congress has consistently viewed Work-Study as the embodiment of the American Dream (working one's way through college), that support appeared assured. Indeed, CWS funding had never seen a year-to-year decline and going into 1981 had achieved third place among student aid programs, behind the massive Guaranteed Loan and Pell (ex-Basic) Grant programs.

The new policy stance of the federal government, at least as enunciated by the Administration, casts that position into serious doubt. Current proposals call for elimination of the two other campus-based student aid programs, Direct Loans and Supplemental Grants, and a substantial reduction in CWS funding. With reductions in Pell Grants and more stringent eligibility for loans, the demand for <u>any</u> sort of aid must increase sharply. At the same time, reduced institutional support, coupled with steadily increasing costs and ceilings on state aid will inevitably force more institutional reliance on indirect subsidies, such as the work force augmentation provided by CWS. Under such a set of circumstances, the experiential learning attributes of CWS are likely to fall by the wayside, as the demands of financial stress push to the fore. Already there are reports of institutions using CWS-paid students to replace full-time employees terminated for lack of funds, despite clear statutory prohibitions against such action. Schools that for years had participated in off-campus CWS-funded internship programs have withdrawn their support, claiming that

they must use all their Work-Study funds on-campus. Should the proposals to sharply reduce all student aid come to pass, these effects upon the College Work-Study Program as an instrument to support experiential education could be multiplied exponentially. Yet the forces doing battle over these changes view them almost entirely in the context of their financial effects on the students and on the institutions. That is a natural situation, since financial implications always outshadow educational arguments. The result is that the experiential learning community continues to be a pawn in a game of public policy being played between those who advocate a federal withdrawal from support for higher education and those who view that support as basic to our present postsecondary system.

The future of the College Work-Study Program is perhaps the best example of policy decisions affecting experiential education being made with little or no regard for pedagogy. In this sense it may be said that the position of the Administration to reduce federal student assistance does not represent a policy adverse to experiential education. Yet certainly the effects of that policy are likely to have substantially negative outcomes for programs built on fifteen years' of consistent federal support.

There are of course also examples of affirmative policies intended to affect experiential learning. The most notorious of these are the policies of the Veterans Administration, in part enshrined in law and in part emerging from the fertile imaginations of the bureaucracy. Education, in the view of those who have run these programs for over three decades, consists of a teacher confronting a room full of students for a discrete number of hours a week, multiplied by a certain minimum number of weeks.

Through that process, learning is imparted. Anything that deviates from that norm is at best less effective and at worst fraudulent. The laws, regulations and guidelines built upon this premise constrict the availability of experiential education techniques for just that clientele -- older students returning to their education after serving a military commitment -- which can best take advantage of it. This is affirmative policy, representing the government's opinion of what constitutes learning suitable to be subsidized by the public.

The overtness of the policies contained in the veterans' education programs at least makes them amenable to change as the forces can be marshalled and the arguments assembled. There are other such affirmative policies which are neither enshrined in law or articulated in such fashion as to admit of ready opposition, yet their effects can be every bit as chilling to the advancement of experiential learning.

One example is the enforcement of the "satisfactory progress" and "enrollment status" requirements of the federal student financial assistance programs. Under the law, a student must be making satisfactory progress in his or her studies to remain eligible to receive federally-supported financial assistance. Similarly, the student must be engaged in an instructional program meeting certain specific requirements. In the past, students taking part in experiential programs, at least of the sponsored learning variety, have been considered qualified to receive such support. Now, however, there is evidence that this policy is being reconsidered. Program reviews at the regional level have raised questions whether there can be an eligible educational program when no "instruction" takes place, instruction being defined (shades of the VA) as the interplay between a teacher and a

student in a controlled environment. The policy issue faced here is two-fold. First, there is the question whether experiential education activities meet a new "instructional" test. Second, and to this observer far more serious, is the basic question whether the government ought to be delving into the process of learning, as opposed to requiring reasonable standards of quality for the outcome.

The result of these inquiries is still unclear, as the matter has been taken under advisement at the policy level of the agency. Nonetheless, the fact that the issue could be raised at all in the 1980's should make wary every experiential education practitioner. That they could be raised in the context of a punitive review, as opposed to an open consideration of so basic a policy issue, raises all the more reason for concern. The making of policy, with potentially far-reaching ramifications, deep within the bowels of the bureaucracy, with virtually no opportunity for public consideration and involvement, is serious in itself. That such issues could still be considered matters for internal agency review, as opposed to policy determinations of the highest order of magnitude reinforces the belief that experiential learning is still viewed, within the official establishment, as peripheral to the larger postsecondary system. Interestingly, these problems have created little stir in that larger community, perhaps because that perception of experiential education's proper place is not altogether limited to the bureaucrats.

It is, of course, not just the federal government that makes education policy. Indeed, long tradition has it that education is the domain of the states, and it is just this reading of the Reserved Powers clause of the Constitution that seems to be guiding the present

Administration's efforts to withdraw the federal government from the education arena. The states, in turn, are increasingly fashioning licensing and certification requirements that speak to the issue of what is or is not education. In some respects, the consequences of this state action can be far more draconian than those arising from federal policies. In the latter case, all that may be at risk is financial support, and a given program may certainly be able to continue to operate without such assistance. Witness, for example, the continuance of the Weekend College at Wayne State University despite the limitations imposed upon it with regard to the ability of veterans to receive support for their enrollment. In the case of state regulation, however, what is at stake is the very survival of the program. In most states, denial of authorization of a program means the program cannot be offered, whether financially viable or not. While such state regulation is most prevalent in the public sector, where the distribution of public monies to fund the program offers the excuse for close regulation. in an increasing number of states independent colleges are coming under similar regulation, in no small degree arising from the growing reliance of these schools on state financial assistance.

State regulation is not only inevitable, it is also arguably essential. Education is too valuable a service not to be subject to some semblance of control, to protect the public from abuse and the valid purveyors from the depredations of unscrupulous competitors. When everyone was providing roughly the same type of service, this kind of regulation was relatively straightforward. Separating the knaves from the knights was understandable in principle, if not so easily carried out in practice. With the development of alternative delivery systems, however, the pristine nature of this process has become clouded with conflict as to what properly

constitutes postsecondary education. This problem is particularly acute in the experiential education arena, and especially so with regard to programs that deal with the assessment of prior learning. State policy may limit the amount of equivalent credit that may be awarded for prior learning, limit the degrees to which such credit may be attached, or otherwise constrain the freedom of the institution to configure its academic program. Again, this control is not altogether without justification, given the abuses that appear to have occurred on occasion in name of experiential learning. Nonetheless, control of abuse ought not be used as an excuse to create a policy which has the effect of constraining the development of new forms of delivery of postsecondary education services.

A corollary of state regulation in the development of policies affecting experiential education is the evolving role of the accrediting agencies. Originally, accreditation, always prefaced by the term "voluntary", has been considered as separate and distinct from the governmental process. Over the years, however, the line separating accreditation from government action has become blurred, to the extent that now some argue that the accrediting bodies, and particularly the regional associations, are acting as the surrogates of the government and must therefore be subject to the same levels of control and provide the same rights and protections.

Concern with the expanding role of accrediting agencies is not unique to experiential education. However, the policies of these quasi-governmental entities can have the effect of defining whether or not an experiential program may be included in the curriculum of a given institution, or indeed whether that institution may be accredited or

licensed. The developing policies in this area must therefore be considered with care.

The primary problem of regional accreditation is the absence of uniformity among the regions. A program that may be fully within the requirements of one regional body may be deemed unacceptable by another. In the past, when institutions tended to be confined to a specific physical location, such distinctions were of lesser significance. A college operating in a given region had notice of the requirements of the cognizant accrediting agency, and while one might complain that those standards were perhaps unrealistic or not consistent with developments in the field, nonetheless they were subject to reasonable description and, as necessary, debate. However, as institutions and their programs have become less bounded by physical facilities, as is particularly the case with experiential education, both prior learning and sponsored, the risk of running afoul of the varying standards of more than one accrediting body becomes very real. Where the action of only one accrediting body is recognized by a state, as has occurred in California with its sole recognition of accreditation by the Western Association of Schools and Colleges (WASC), there exists the possibility of an institution being whipsawed between conflicting entities. The full-faith-and-credit once afforded accreditation status by sister bodies seems to be falling by the wayside, making institutions subject to a variety of rules and interpretations. Programs that are not campus-bound are likely to find themselves under multiple scrutiny, with potentially conflicting policies affecting their futures. Perhaps most ominous is the trend towards using the accrediting and licensure processes not to protect the consumer of the educational

services from fraud but to protect existing institutions from competition. Programs and services that can reach across state and regional boundaries are particularly vulnerable to the effects of such protectionism. Unfortunately, it is often difficult to differentiate between policies legitimately intended to protect the public good and those intended to preserve the status quo. While actions of state licensing bodies are subject to full requirements of due process and equal protection, those of the "voluntary" accrediting agencies have tended to escape such scrutiny. Thus, exclusionary actions by the latter may be more difficult to contest than that of the former, even when a state relies on the actions of an accrediting body in making its own licensure decision. The fine line between the right to make policy and the abandonment of fundamental rights can easily be crossed. The courts have yet to speak with clarity as to where the equities will ultimately lie.

In summary, policies affecting experiential learning are many and varied. The sharp change in the direction of federal policy, from a commitment to afford all students the opportunity to take advantage of the academic marketplace to one that seeks to drastically limit the totality of federal involvement, must be viewed as threatening the implicit support experiential education has received over the past fifteen years. The relatively stable funding bases, notably College Work-Study and Cooperative Education, are likely to be substantially eroded, while support for innovation from sources such as the Fund for the Improvement of Post-secondary Education and the National Institute of Education may likewise be in serious jeopardy. Federal policy may instead shift more completely towards scrutiny of the ways limited federal funds are used, with increased

emphasis placed on ferreting out alleged fraud and abuse. Unfortunately, it is the new and unknown that is often confused with the fraudulent: it is easy for the unknowing to equate credit for assessed prior learning with credit for no academic work, or to view sponsored experiential learning as a way to avoid the presumed rigors of the classroom. Increasing reliance on the states and upon the accrediting agencies does not seem likely to mitigate this situation, since their sophistication in the area of experiential education is generally no better than that of the federal agencies their efforts are replacing.

The solution must rest with the experiential education community. The education policy makers must be educated. Policies whose outcomes -- whether intended or otherwise -- discriminate against experiential learning in any of its forms must be highlighted, debated and, where appropriate, fought and defeated. A uniform national policy with regard to experiential education is probably not achievable, given the present circumstances, nor may it well be desirable. But just as there is reciprocity and full faith granted between the states for a wide variety of activities and professions, so there needs to develop policies that will enable experiential learning, unbridled as it is by the confines of the campus, to operate without unnecessary restriction. The alternatives, of either an anarchic situation with each state (and accrediting agency) making its own rules without regard to any other, or the imposition of a national standard created by the Congress or the executive, do not appear as either attractive or workable.

The radical changes proposed by the current Administration may well be transitory, and the nation may return to its commitment to supporting

access to postsecondary education for all its citizens. Or, these proposals may signal a real shift in public policy, creating a new reality within which the experiential education community must operate, just as the Higher Education Act of 1965 signalled another such shift fifteen years ago.

That there is still no coherent national policy respecting experiential education is apparent. That such a policy may emerge in an affirmative manner appears unlikely under the present circumstances. However, it is altogether possible for policy decisions to be made that substantially affect the future of experiential education in its varying forms, through indirection, inadvertance or ignorance or unconcern over the consequences. It is against these outcomes that all concerned with experiential education must guard. It is for policies that treat experiential education equally with other pedagogies that all must aspire.